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December 15, 2020

**Via Electronic Filing**

The Honorable Zahid N. Quraishi  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

RE: Donell Freeman v. Kabeeruddin Hashmi, M.D. and Correct Care  
Solutions LLC, d/b/a WellPath, et al.  
Docket No.: 3:18-cv-7802  
D/A: 8/23/11  
Our File No.: 1275-107074 (MJB/KTS)

Dear Judge Quraishi:

This office represents Defendants, Wellpath, LLC f/k/a Correct Care Solutions, Kabeeruddin Hashmi, M.D., and Daniel Unachukwu in the above-captioned matter. Please accept this correspondence as Defendants' formal objection to Plaintiff's Affidavit of Merit.

On December 14, 2020, Plaintiff filed an Affidavit of Merit authored by Renee Dahring, MSN, RN, CNP, CCHP, FAANP. Please be advised that Defendants object to the Affidavit of Merit by Nurse Dahring as she is not qualified to offer an opinion as to Daniel Unachukwu and Defendants collectively. The Affidavit of Merit Statute requires that the Affidavit of Merit be issued by an affiant who is licensed within the same profession as the Defendant. As declared in his Answer, Daniel Unachukwu is an Advanced Practice Nurse. Renee Dahring is notably not an Advanced Practice Nurse. Accordingly, Renee Dahring is not qualified to author an Affidavit of Merit against Daniel Unachukwu or Defendants collectively. Nurse Dahring's Affidavit of Merit is also substantively deficient as it fails to name any specific Defendants nor does it describe any negligent act with specificity. *See Fink v. Thompson*, 167 N.J. 551, 559-60 (2001).

{NJ166118.1}

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While this matter is in Federal Court and a conference pursuant to *Ferreira v. Rancocas Orthopedic Associates*, 178 N.J. 144 (2003) need not be scheduled, please be advised that Defendants intend to pursue all legal remedies available to them in compliance with the Affidavit of Merit Statute.

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN,  
DOHERTY & KELLY, P.C.**

Melissa J. Brown

Melissa J. Brown, Esquire

MJB

cc: Michael Poreda, Esquire (*Via E-Courts*)  
Thomas Reardon, III, Esquire (*Via E-Courts*)